

CONTINUATION OF CRIMINAL COMPLAINT

I, Dillard Hayes, being first duly sworn, hereby depose and state as follows:

Introduction

1. I, Dillard Hayes, am a Detective Sergeant with the Michigan State Police (MSP) and have been so employed since 2015. I am also a Task Force Officer (TFO) of the Federal Bureau of Investigation (FBI) and have been so employed since 2025. I am currently assigned to the MSP 6th District Headquarters and FBI Detroit Field Office, Grand Rapids Resident Agency. During my employment, I have conducted investigations involving violations of both state and federal criminal laws, including violations related to child exploitation and pornography. I am familiar with the various statutes of Title 18, United States Code, Chapter 110 – sexual exploitation and other abuse of children, including violations pertaining to **Sexual Exploitation of a Child (18 U.S.C. § 2251(a)), the “Subject Offense.”**

2. The facts in this Continuation are based on my personal observations, my training and experience, and information obtained from other agents and witnesses. I submit the following to establish probable cause to believe that CHRISTIAN VANDERVEEN (VANDERVEEN) has committed the Subject Offense. This Continuation is intended merely to show probable cause that VANDERVEEN committed the Subject Offense and does not set forth all of my knowledge concerning this matter.

Definitions

3. “Child pornography,” as defined in 18 U.S.C. § 2256(8), is any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where (a) the production of the visual depiction involved the use of a minor engaged in sexually explicit conduct, (b) the visual depiction is a digital image, computer image, or computer-generated image that is, or is indistinguishable from, that of a minor engaged in sexually explicit conduct, or (c) the visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaged in sexually explicit conduct.

4. “Sexually explicit conduct,” as defined in 18 U.S.C. § 2256(2), means actual or simulated (a) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex; (b) bestiality; (c) masturbation; (d) sadistic or masochistic abuse; or (e) lascivious exhibition of the anus, genitals, or public area of any person.

Probable Cause

5. On or around 12/21/2024, the mother of an 11-year-old girl, herein referred to as minor victim 1 (MV1), made a report with the Michigan State Police (MSP) Hart Post.¹

6. MV1’s mother reported that MV1 possessed a cell phone that was

¹ Although the identity of the minor is known, I have not included it here to protect the identity of the victim.

repeatedly receiving messages via Facebook Messenger from VANDERVEEN on 12/21/2024. VANDERVEEN was the former neighbor of MV1 and her mother.

7. In the messages, VANDERVEEN requested that MV1 unblock him on Snapchat.² MV1's mother then took control of MV1's cell phone and unblocked VANDERVEEN on Snapchat.

8. VANDERVEEN then messaged MV1 on Snapchat and repeatedly requested to exchange "pics." VANDERVEEN then sent a nude image of an erect male penis to MV1 via Snapchat and stated that MV1 had sent him pictures of her "boobs" before. During the conversation, VANDERVEEN acknowledged that MV1 is under the age of 13.

9. MSP Trooper Dawson responded to MV1's residence and viewed the above-mentioned conversation and screenshots of it have been placed into evidence. I have reviewed the screenshots.

10. A search warrant was obtained for VANDERVEEN's residence located at 3875 Yorkland Dr. Apt. 2 in Comstock Park, Michigan. The search warrant was executed on 2/9/2025, and VANDERVEEN was detained and transported to the MSP Grand Rapids Post to be interviewed. Additionally, two cell phones were seized from VANDERVEEN's home pursuant to a search warrant: one Apple iPhone and one

² Snapchat is a visual messaging application that is available as a mobile and web application; the mobile app is available through the iPhone App Store and Google Play Store, while the web application can be accessed via the Internet at web.snapchat.com. Snapchat provides users a way to send a receive "self-destructing" messages, pictures, and videos.

Motorola G Stylus.

11. I mirandized and interviewed VANDERVEEN at the MSP Grand Rapids Post. He admitted to asking MV1 for nude images. He stated that he received nude images from her, and that they were still in the camera roll of his Apple iPhone. VANDERVEEN provided written consent to have both of his cell phones searched and identified them as belonging to him.

12. After the interview concluded, VANDERVEEN was transported back to his residence. Shortly after being dropped off, law enforcement asked VANDERVEEN to identify which of the numerous images on his iPhone depicted MV1. VANDERVEEN identified two items of child pornography that MV1 sent to him—one was saved to his iPhone as an image, and one was a video. Both of these pieces of media were located on his iPhone camera roll. Both items of media had associated creation dates of 11/1/2024. The metadata also established that the two items of media were created in Newaygo, Michigan. I have viewed both of these items.

13. The saved image depicted MV1's exposed vagina that MV1 sent to VANDERVEEN via Snapchat.

14. The video depicted MV1's exposed vagina while she inserted her finger into it. MV1 sent this video to VANDERVEEN via Snapchat on his Motorola G Stylus, and he separately recorded it on his iPhone in order to preserve it. Near the end of this video, part of VANDERVEEN's Snapchat messages to MV1 are visible and read as follows: "You should send a video of you" and "in your pussy and playing with[.]" Thus, it appears that VANDERVEEN was asking for this video from MV1.

15. Both of VANDERVEEN's cell phones were extracted and analyzed by MSP Computer Crimes Unit (CCU) on 2/14/2025. CCU located the aforementioned two pieces of media that depicted MV1 saved on VANDERVEEN's Apple iPhone. CCU also located usernames and account logins on the iPhone, which showed that VANDERVEEN was the primary user and operator of the phone.

16. Both of VANDERVEEN's cell phones were made outside the state of Michigan.

17. At the time MV1 sent the child pornography to VANDERVEEN, she lived in the Western District of Michigan.³

CONCLUSION

18. Based on the foregoing, I believe there is probable cause to believe that CHRISTIAN VANDERVEEN has committed the crime of Sexual Exploitation of a Child, in violation of 18 U.S.C. § 2251(a), in the Western District of Michigan.

³ Her address is known to me, but I have omitted it to protect her personal identifying information.